

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Case No: 1:24-CV-00221

CRAIG CUNNINGHAM,

Plaintiff,

v.

**WALLACE & GRAHAM, P.C.,
MONA LISA WALLACE, BILL
GRAHAM, WHITNEY WALLACE
WILLIAMS, MARK P. DOBY,
RHINE LAW FIRM, P.C., JOEL R.
RHINE, SOKOLOVE LAW, LLC,**

Defendants.

**SOKOLOVE LAW'S MOTION
FOR LEAVE TO FILE THIRD-
PARTY COMPLAINT**

SOKOLOVE LAW, LLC,

Cross-Plaintiff,

v.

**BRENT NILS CUSHMAN and
BLAZEN MEDIA, LLC,**

Third-Party Defendants.

Defendant Sokolove Law, LLC, (“Sokolove Law”), by counsel and pursuant to Fed. R. Civ. P. 14(a), requests leave to file a third-party Complaint against Third-Party Defendants Brent Nils Cushman (“Cushman”) and Blazen Media, LLC (“Blazen Media”). As explained more fully in the accompanying Memorandum in Support of its Motion for Leave, Sokolove Law has discovered facts upon which to support the filing of a third-party Complaint and its demands for indemnification have gone unanswered.

WHEREFORE, Sokolove Law hereby requests that its motion be granted and that it be allowed to file a third-party Complaint against Brent Nils Cushman and Blazen Media, LLC.

Respectfully submitted, this 14th day of March, 2025.

SOKOLOVE LAW, LLC

By: /s/ Virginia Bell Flynn
Virginia Bell Flynn (N.C. State Bar No. 59109)
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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of March 2025, I electronically filed the foregoing *Motion for Leave to File a Third-Party Complaint* with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

By: /s/ Virginia Bell Flynn
Virginia Bell Flynn (N.C. State Bar No. 59109)